

**CALIFORNIA EMERGENCY MANAGEMENT AGENCY****LAW ENFORCEMENT AND VICTIM SERVICES DIVISION**

3650 SCHRIEVER AVENUE  
MATHER, CALIFORNIA 95655  
(916) 324-9104  
FAX: (916) 324-8554

January 26, 2010

Jennifer Lake, Project Director  
YWCA Sonoma County, Inc.  
PO Box 3506  
Santa Rosa, Ca 95402

Re: DV09241205, YWCA Domestic Violence Service Program

Dear Ms. Lake:

On January 21, 2010, I conducted a site visit of the YWCA Domestic Violence Service Program operated by YWCA Sonoma County, Inc. Thank you for your time and cooperation during the Site Visit. It was a pleasure meeting with you, Julie Lafranchi, Denise Frey, Kelly Walton, and all of the other fantastic staff working on the program.

During the site visit, we discussed Cal EMA's requirements for the project, the goals and objectives of the program, the project's source documentation, and the reporting requirements. As a result of the visit, I have identified areas which need corrective action. Each finding is listed below, as well as the corrective action necessary for compliance and due date by which the corrective action must be completed.

**California Environmental Quality Act (CEQA)**

Finding: A current CEQA was not on file.

Citation: Recipient Handbook Section 2153 requires all Cal EMA funded projects to certify compliance with CEQA. A copy of the CEQA compliance memo or other certification must be completed once during the project's grant award cycle. The original copy must be retained on file for review during site and monitoring visits by Cal EMA staff.

Corrective Action: The project must obtain a current CEQA and submit a copy to Cal EMA by **(March 26, 2010)**. A sample CEQA Compliance memo is located in the Recipient Handbook, Appendix U.

Comment: Contact your city or county planning department to have them prepare an environmental document stating whether the project will have a significant effect on the environment.

## **Staff Personnel Files**

Finding: The staff personnel files did not contain a signed and dated Drug Free Workplace statement.

Citation: Recipient Handbook Section 2152.3 (c)(2) states “(Employees) will agree to abide by the terms of the company’s [Drug Free Workplace] statement as a condition of employment on the contract or grant.”

Corrective Action: Personnel files for grant-funded staff must be brought into compliance by (**March 26, 2010**) and Cal EMA is to be notified once this is completed.

In addition to these findings, several suggestions are also noted as they relate to the current operation and policy:

## **Board of Directors**

Current Policy: According to Denise Frey, current board members are recruited and subsequently placed on a committee until their viability as board members can be determined. Candidates are then voted onto the board by existing board members. Current by-laws indicate no less than 1/3 of all directors serving must be elected into the position.

Recommendation: Statutory guidelines establish the process whereby directors for the board of a non-profit organization enter office (CC 5220-5222). Directors must be elected or selected by a qualified designator {section CC 5220(d)}. The current by-laws are ambiguous in identifying the selection process and lack an organized formalized method. The method currently used may not meet statutory guidelines for the selection of board members. Legal clarification on the issue should be sought, and policy should be established indicating a formal selection process.

## **Client Confidentiality**

Current Policy: Policy and protocol for the retention of client files is documented in the Safe House Procedure Manual. This policy dictates the storage of files for three years until the files are transitioned into long-term storage.

Recommendation: While documented protocols exist up until the point of long-storage, no protocol exists for the handling of client files during or after that period. Written protocols should be established for the long-term storage of and eventual destruction of client files, in order to protect against the dissemination of confidential client information.

Enclosed is a copy of the completed Site Visit Checklist form for your review. Please sign the cover page and return a copy of the page to me by **Thursday February 4, 2010** as confirmation of its receipt.

Thank you again for your hospitality during the visit. If you have any questions or need assistance, please contact me at (916) 324-9104 or Jason.stalder@oes.ca.gov.

Sincerely,

Jason Stalder  
Criminal Justice Specialist  
Domestic Violence Section

Enclosures